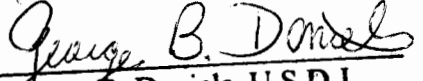


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January 8, 2020

SO ORDERED:


George B. Daniels, U.S.D.J.

Dated: JAN 09 2020

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Ashton, et al. v. Al Qaeda Islamic, et al., 02-CV-06977 (GBD) (SN)

Dear Judge Daniels:

We write in connection with Magistrate Judge Netburn's Report and Recommendation granting in part and denying in part the motion on behalf of certain *Ashton* Plaintiffs' for solatium judgments for non-immediate family members of victims of the September 11, 2001 terrorist attacks. *See* 02-cv-6977 (S.D.N.Y.), ECF No. 1124, Filed 12/19/2019 (the "R&R"). That R&R was filed on December 19, 2019 and any objections were to be submitted within 14 days of the date of filing.

While objections would, thus, have ordinarily been submitted on or before January 2, 2020, we had several other deadlines in this case, including the January 3, 2020 deadline for filing any additional claims for non-immediate family members for consideration prior to the United States Victims of State Sponsored Terrorism ("USVSST") Fund Round 3 deadline, as well as preparation of claims for economic loss to estates (to be filed by January 15, 2020 for consideration before the USVSST Fund Round 3 deadline), letter-briefing on injury claims and discovery motions relating to the portion of the lawsuit focused on the Kingdom of Saudi Arabia. Also, in light of the holidays, we had limited personnel, with attorneys and staff involved in the September 11, 2001 terrorism suit absorbed with the deadlines noted above. Accordingly, we were not able to determine whether we had a basis to file any objections to the R&R by January 2, 2020. While it may be the case that no such objections will be filed, in order to determine whether there may be a basis for objecting to any of the denials contained in the R&R, we respectfully ask that this Court extend the time by which any such objections must be made until January 22, 2020 (one week after the deadline for filing motions for final judgments on behalf of estates.) As Iran is the only defendant to this motion and has defaulted (and there is no suggestion that it will appear) this extension of time will impose no undue prejudice.

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For the foregoing reasons, we believe that good cause exists to grant this letter-request for a *nunc pro tunc* extension of time by which to file any objections to the Report and Recommendation (ECF No. 1124) until January 22, 2020.

Respectfully,

Kreindler & Kreindler LLP

/s/ Megan W. Benett

cc: All counsel of record via ECF